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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 ANNA MARIE AMPEY,)	Case No.	2:24-cv-02055-GMN-BNW
12)		
	Plaintiff,)	
13 vs.)		STIPULATION AND ORDER TO EXTEND
14 ALBERTSON'S LLC, a foreign)		DISCOVERY DEADLINES
15 Corporation d/b/a; Albertson's DOES 1)		(Second Request)
16 through X; and ROE CORPORATIONS)		
17 I through X, inclusive,)		
)		
	Defendants.)	

18 Plaintiff, Anna Marie Amp, by and through her attorneys, Marcus A. Burg, Esq.,
 19 Boyd B. Moss Esq., and John C. Funk, Esq. of the law firm Moss Berg Injury Lawyers and
 20 Defendant Albertson's LLC., by and through its attorneys, Jack P. Burden, Esq. and Jacquelyn
 21 Franco, Esq. of the law office of BACKUS | BURDEN; pursuant to LR 6-1 and LR 26-3, and for good
 22 cause, hereby stipulate and agree to an extension of discovery deadlines based on the following
 23 representations:
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25 **A. Discovery Completed:**

- 26 1. Plaintiff has provided disclosures and supplemental disclosures pursuant to FRCP
 27 26.1;
- 28

2. Defendant has provided disclosures and supplemental disclosures pursuant to FRCP 26.1;
3. Plaintiff has served her First Set of Interrogatories and Requests for Production of Documents to Defendant;
4. Defendant has served its First Set of Interrogatories and Requests for Production of Documents to Plaintiff;
5. Plaintiff's has responded to Defendant's First Set of Interrogatories and Requests for Production of Documents;
6. Defendant has responded to Plaintiff's First Set of Interrogatories and Requests for Production of Documents;
7. Defendant has taken Plaintiff's deposition;
8. Plaintiff has conducted a site inspection;
9. Defendant has subpoenaed and obtain Plaintiff's partial set of medical records.

B. Discovery that remains to be completed:

1. Plaintiff's First Set of Requests for Admissions;
 2. Defendant's First Set of Requests for Admissions;
 3. Defendant needs to subpoena and obtain Plaintiff's remaining and complete set of Plaintiff's medical records;
 4. Designation of initial and rebuttal expert witnesses;
 5. Depositions of FRCP 30(b)(6) witness(es) of Defendant;
 6. Deposition(s) of the parties' expert witnesses and rebuttal expert witnesses, if necessary;
 7. Deposition(s) of relevant witnesses, percipient and medical, if necessary; and
 8. Any and all remaining discovery to be determined by the parties as needed.

1 **C. Reasons that Discovery has not yet been completed are:**

2 The parties are actively working to conduct and complete discovery. Defendant took
 3 Plaintiff's deposition on May 15, 2025. During this deposition, information regarding prior
 4 surgery and medical providers unknown to Defendant, as well as other details about her medical
 5 history, were revealed. Subpoenas have been issued to retrieve said medical records but are still
 6 outstanding. Defendant therefore needs additional time to obtain medical records of the same.
 7 With the approaching Initial Expert deadline, more time is needed to obtain and assess these
 8 records. The parties respectfully submit that the above and foregoing constitute good cause for
 9 the extension of the discovery deadlines by thirty (30) days.

Scheduled Event	Current Deadlines	Proposed Deadline
Discovery Cut-off [LR 26 1(b)(1)]	September 2, 2025	October 2, 2025
Final date to file motions to amend pleadings or add parties [LR 26-1(b)(2)]	June 4, 2025	CLOSED
Initial Expert Disclosure pursuant to FRCP 26 (a)(2)	July 7, 2025	August 6, 2025
Rebuttal Expert Disclosure pursuant to FRCP 26(a)(2)	August 6, 2025	September 5, 2025
Dispositive Motions [LR 26-1(b)(4)]	30 days after the discovery cut-off date	TBD by Trial Date

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1 D. **Current trial date:**

2 A date for this trial has not been set.

3 WHEREFORE, the parties hereto respectfully request this honorable Court to adopt the
4 foregoing stipulation of the parties.

5 **IT IS SO AGREED.**

6 DATED: July 2, 2025

7 DATED: July 2, 2025

8 **Moss Berg Injury Lawyers**

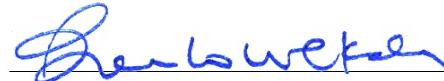
9 **BACKUS | BURDEN**

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28 **ORDER - 2:24-cv-02055-GMN-BNW**

1 ***IT IS SO ORDERED.***



2 DATED: 7/14/2025